

**From:** Buckbee, Rachel A [Rachel.Buckbee@bp.com]  
**Sent:** 8/19/2019 6:56:20 PM  
**To:** Pavitt, John [Pavitt.John@epa.gov]; Williams, Christopher [Williams.Christopher@epa.gov]  
**CC:** Glover, Robin [Robin.Glover@bp.com]  
**Subject:** RE: Records Request, EPA Air Compliance Inspection of BPXA GC#2  
**Attachments:** OGI Tag and Barcode.jpg

John-

Please see the notes below on the requested items.

Note- many of the files are in the CD that I am delivering to your office today.

Records Request:

1. Please send me records of leak inspections at N-Pad and W-Pad (only):
  - a. For new leaks identified during the inspection, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.
    - i. Included on the tracking OOOOa tracking sheet, PDF reports and in the N and W Pad Open Maint orders list.
      1. Note that GC2 is in TAR and all of these items are planned to be addressed during this outage.
  - b. For leaks placed on Delay of Repair in the *Annual Compliance Report* (October, 2018): Please provide records for leaks identified after 8/2/17:
    - i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified
    - ii. Photos of leaking components, showing GPS coordinates
      1. We do not have photos of the leaking components with GPS as when working in the metal buildings the GPS does not work.
        - a. A site photo of the pad entrance sign with GPS is taken when accessing the pad
          - i. These are all included in the folders with the daily tracking sheets completed for that days monitoring event
    - iii. Photos of tags put onto leaking components
      1. See attached photo of sample OGI tags utilized for the findings.
      2. We do not take pictures of the tags being put on the equipment as this is not a regulatory requirement.
    - iv. The Severity Ranking for each leak
      1. Severity rankings are included on the OOOOa tracking sheet 8-3-18 to 8-12-19 and on the PDF but NOT included on the prior leaks as we did not start tracking this information in the OOOOa tracking file before 8/3/18. This is not a regulatory requirement, this is a BP only internal process.
    - v. Work orders related to repairing leaks
      1. See the sheet "N and W Pad open WOs as of 8-12-19 Maintenance Orders.xlxs" for current open item WO's that are in SAP. Prior WO's numbers are listed for items that did not get repaired immediately in the OOOOa tracking sheets. These WO are numbers are different as they are in the prior work management system Maximo.

- vi. Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.
  1. Included on the OOOOa tracking sheets and in the folders with daily sheets. Also the bubble check forms are included for items that were verified not leaking via bubble check.

If you have any questions, please don't hesitate to reach out to me.

Thanks,

Rachel

**Rachel Buckbee**

**Air Quality Compliance Advisor & Acting Environmental Team Lead**

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**From:** Pavitt, John <Pavitt.John@epa.gov>

**Sent:** Friday, August 2, 2019 11:12 AM

**To:** Buckbee, Rachel A <Rachel.Buckbee@bp.com>; Glover, Robin <Robin.Glover@bp.com>

**Cc:** Williams, Christopher <Williams.Christopher@epa.gov>

**Subject:** Records Request, EPA Air Compliance Inspection of BPXA GC#2

Hello Robin. I'm sending this email to request records as part of the joint EPA/State of Alaska air compliance inspection on July 16, 2019 of the GC#2 facility. The inspection focused on compliance with New Source Performance Standards (NSPS), Subpart OOOOa. During the inspection we visited N-Pad and W-Pad.

Thank you for already emailing me 2 records we discussed during our time on site: BPXA's Severity Ranking system flow chart, and a copy of a State permit modification request letter (for disaggregation). You also gave me a copy of your Fugitive Emissions Monitoring Plan while I was on site.

Records Request:

1. Please send me records of leak inspections at N-Pad and W-Pad (only):
  - a. For new leaks identified during the inspection, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.
  - b. For leaks placed on Delay of Repair in the *Annual Compliance Report* (October, 2018): Please provide records for leaks identified after 8/2/17:
    - i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified
    - ii. Photos of leaking components, showing GPS coordinates
    - iii. Photos of tags put onto leaking components
    - iv. The Severity Ranking for each leak
    - v. Work orders related to repairing leaks
    - vi. Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.

I would appreciate receiving these records by Friday, August 16. Please let me know if you have any questions about this request.

Thank you again for your help during the on-site inspection and for the records already provided.

Sincerely,

John Pavitt, Air Compliance Inspector  
Air and Toxics Enforcement Section  
U.S. EPA Region 10  
Alaska Operations Office  
Anchorage, AK  
Phone: (907) 271-3688